

**SUPPLEMENTAL DECLARATION OF TOM HAEFKE**

**EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSE ANDREU, )  
v. )  
Plaintiff, ) Case No. 07 C 06132  
UNITED PARCEL SERVICE, INC., ) Judge Der-Yeghiayan  
Defendant. )

**SUPPLEMENTAL DECLARATION OF TOM HAEFKE**

I, Tom Haefke, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I have been employed by UPS since October 1, 1973. Since December, 2002, I have been the Labor Relations Manager for UPS's North Illinois District.
2. While UPS supervisors do have some disciplinary authority, they do not have the ability to unilaterally terminate a package car driver for dishonesty.
3. There was no issue regarding the timeliness of the Guyton and Blackman grievances of February, 2005 as they were already resolved and the discipline imposed prior to Snyder signing off on them on March 2, 2005.
4. Neither Blackman nor Guyton were put on notice of termination for the incidents of February, 2005.

5. Snyder was Ziltz's immediate supervisor and UPS management personnel are directed to choose their immediate superior as one of their raters for the QPR evaluation.
6. Andreu's status had not been resolved prior to the completion of the fifteen day period set for filing a grievance.

FURTHER DECLARANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 5, 2008

  
Tom Haefke